

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**FILED**

JUN 01 2022 

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA,  
PLAINTIFF,

v.

ALBERT ROSSINI,  
DEFENDANT.

Case No. 17 CR 722  
HON. JOHN THARPP  
District Court Judge

AFFIDAVIT OF ALBERT ROSSINI  
IN SUPPORT OF  
MOTION TO DISMISS THE INDICTMENT

With respect to Rule 47 of the Federal Rules of Criminal Procedure,  
Defendant Albert Rossini does state the following.

(1). That he was granted pretrial release in case number  
15 CR 515-1 in the U.S. District Court for the Northern District of  
Illinois on August 25, 2015 before Magistrate Finnegan and several  
days thereafter affirmed before Magistrate Judge Jeffrey Gilbert  
and placed on home confinement subject to conditions.

(2). That he was granted permission to work and earn a living  
by the United States Probation Department, specifically pretrial  
officer Justin Wiersema in July 2016.

(3). That at all relevant times, Defendant had been requested  
by Jorge Perez, owner of AFT JPS Import and Export International  
and Jorge R. Perez Enterprises, to provide services as a business

(Affidavit of Albert Rossini)

May 26, 2022

consultant to AFT JPS Import and Export International and affiliated companies. Defendant Rossini prepared and organized construction records, pertinent agreements and regulatory documentation, together with some financial applications of the Perez restaurant and construction business.

(4). Jorge Perez provided Rossini with checks that Mr. Perez had signed on the accounts of both AFT JPS Import and Export International, Inc. and AFT JPS Import and Export International LLC, dba Another Chicago Construction Company, in order for Rossini to pay existing corporate obligations of the two aforementioned companies as well as for Rossini's monthly consulting payments. Mr. Perez quite often would travel to Mexico as he had opened a company entitled AFT JPS Import and Export International, CE DA SA Inc. in that country. All disbursed funds by Rossini were believed by him to be in "good" checks.

(5). At no relevant time was cash disbursed by any of the financial institutions to Rossini from the checks issued by him with the exception of a \$6,664 check drawn on AFT JPS Import and Export International. Defendant issued to Guy Stein and which Defendant reimbursed Mr. Stein by Western Union, Money Gram and cash payments.

(6). A check written on AFT JPS Import and Export International and signed by Jorge Perez in the amount of \$2,100 was given by Rossini to Devon Proesel, LLC for Defendant's past due office lease payments for Rossini rental at 3924 W. Devon St., Lincolnwood, IL 60712. Rossini had been a tenant there from 2008 to the time this check was issued.

(7). Rossini wrote a check to Matan Braunshteyn on or about May 23, 2017 from the account of Albert Rossini in the amount of \$5,300

(Affidavit of Albert Rossini)

May 26, 2022

in payment of a loan that Mr. Braunshteyn had made to Rossini. No cash was disbursed from this check.

(8). On May 24, 2017, Rossini issued a check to Guy Stein in the amount of \$7,800. As the check for \$6,664, this check was also drawn on AFT JPS Import and Export International Inc. or AFT JPS Import and Export International, dba Another Chicago Construction Company for replacement of the check in the amount of \$6,664 previously written on May 24, 2017 to Mr. Stein as Defendant had not been informed by Mr. Perez as to which account had sufficient funds. At all times, Defendant believed that the account had sufficient funds.

(9). On July 25, 2017, Defendant deposited a check in the amount of \$25,000 into his account and the check was drawn on AFT JPS Import and Export International, signed by Jorge Perez and was for money owed to Rossini by AFT JPS Imports.

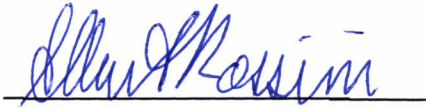
(10). Pretrial Officer Justin Wiersema was given a letter of employment by Mr. Perez on behalf of AFT JPS Import and Export International stating that the company was to pay Defendant \$5,000 per month and detailing Rossini's duties. This letter was given to Officer Wiersema prior to Rossini's employment for Probation Department approval beforehand. Mr. Wiersema met and spoke to Mr. Perez on at least two occasions at Defendant's office, 3924 W. Devon Street, Lincolnwood, IL 60712.

(11). On or about July 26 or 27, 2017, Rossini was given bank account statements of AFT JPS Import and Export and its sister companies well as the bank account statements of Jorge Perez, Eduardo Perez and Eustorgio Perez. It was not until that time, July 26 or July 27,

(Affidavit of Albert Rossini)  
May 22, 2022)

2017 that Rossini became aware of Mr. Perez and his companies' floating of money from one bank account to another and back through the various accounts in an effort to inflate Perez's sales. Defendant was arrested at approximately 6 a.m. on July 28, 2017.

I swear and affirm under penalty of perjury that my statements are true and correct to the best of my knowledge and belief.  
See 28 U.S.C. §1746; 18 U.S.C. §1621.

A handwritten signature in blue ink, appearing to read "Albert Rossini", is written over a horizontal line.

Albert Rossini  
#08043-424  
Metropolitan Correctional Center  
71 W. Van Buren St.  
Chicago, IL 60605

EXHIBIT  
PAYMENTS MADE TO GUY STEIN RE CHECK OF \$6,664

Routing Numbers Western Union	Date	Amount
302-625-0210	6/10/2017	512.50
802-217-3225	6/11/2017	212.50
448-382-0888	6/16/2017	512.50
080-629-4402	6/17/2017	212.50
190-597-3698	6/19/2017	324.50
865-903-9279	6/23/2017	512.50
871-751-7447	6/24/2017	212.50
<b>Money Gram</b>		
709-65850	6/10/2017	499.95

Cash paid to Stein at his Elmwood Park home the week of  
6/23/2017 = \$4,000.00

Total Payments, \$6,999.45

CERTIFICATE OF SERVICE

Defendant Albert Rossini deposited a Notice of Filing, Motion to Dismiss Indictment, Affidavit of Defendant Rossini, and Exhibit in the MCC Chicago Legal Mail System, first class postage prepaid, and addressed to Hon. Thomas Brutton, Clerk of the U.S. District Court for the Northern District of Illinois, 219 S. Dearborn St., Chicago, IL. 60604, on May 26, 2022.

Respectfully submitted,



Albert Rossini  
#08043-424  
Metropolitan Correctional Center  
71 W. Van Buren St.  
Chicago, IL 60605